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Emergis**ISTechnologies**412 - 78 O'Connor Street,
Ottawa, ON. K1P 3A4
CANADA

12 June, 1998.

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554
The United States of America

Attn: Ms. Magalie R. Salas

Subject: In the Matter of *The Communications Assistance for Law Enforcement Act*
CC Docket No. 97-213
Reply Comments Pursuant to Public Notice DA 98-762 (rel. April 20, 1998)

Enclosed for filing in the above referenced proceeding is an original and four (4) copies of the Comments by Bell Emergis - Intelligent Signalling Technologies regarding the Standards associated with the assistance capability required by the Communications Assistance for Law Enforcement Act (CALEA). In addition, this filing is being made pursuant to 47 CFR § 1.52, by facsimile. Bell Emergis - Intelligent Signalling Technologies in accordance with Section 1.52 of the Commission's rules, will retain the original of this filing "until the Commission's decision is final and no longer subject to judicial review".

An additional copy of the Comments is enclosed to be stamped "received" and returned.

Thank you very much for your attention to this matter.

Sincerely,

Gerald W. Fikis, P.Eng
Group Leader - Technology & BL MgmtNo. of Copies rec'd
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:

Communications Assistance for Law
Enforcement Act

CC Docket No: 97-213

COMMENTS OF BELL EMERGIS - INTELLIGENT SIGNALLING
TECHNOLOGIES

Room 412
78 O'Connor Street
Ottawa, Ontario K1P 3A4
CANADA

Filed on June 12, 1998.

CC Docket No. 97-213

Pursuant to Public Notice DA 98-762 (rel. April 20, 1998)

Bell Emergis - Intelligent Signalling Technologies' Reply Comments

Regarding the Technical Requirements and Standards for CALEA

Bell Emergis - ISTechnologies

CC Docket No. 97-213

To: The Commission**1. Summary**

The petitions noted in Public Notice DA 98-762 identify concerns and differing opinions between certain industry segments and law enforcement regarding the technical requirements and standards associated with the Communications Assistance for Law Enforcement Act ("CALEA"). As the FBI and DoJ view the Interim Standard J-STD-025¹ as deficient, they have identified the missing components and have accumulated them within their so called "Punch List".

Bell Emergis - Intelligent Signalling Technologies ("IST") on the other hand, states its support for both the Interim Standard J-STD-025 and the "punch list" items. Specifically, IST joins both "AT&T" and "Ameritech" in recommending the adoption by the Commission of J-STD-025. Further however, as the punch list does not raise particular concern to IST, IST recommends its adoption as an Addendum to J-STD-025 in whatever statutory language the Commission believes appropriate. Quick and formal adoption will ultimately minimize the cycle time needed to bring the information into the vendor community.

2. Background

IST believes that a number of comments provided by industry express concerns with the costs of implementing CALEA within a *switch-based* approach. For example:

1. Nextel Communications Inc notes: "These issues echo the concerns noted above about whether the standard as currently drafted is the most cost-effective implementation."²
2. Ameritech states that: "Needless to say, extraction of post-cut-through digits is an expensive and timely obligation to be placed on telecommunications carriers. It is neither cost effective or efficient for carriers to perform this function."³
3. Finally, AT&T Corp warns that: "AT&T rejects the continued efforts by law enforcement to shift the cost of CALEA to industry..."⁴

Complexity and/or difficulty in designing and/or implementing CALEA requirements however, do not fundamentally lead to the conclusion that the basic requirement is somehow flawed. If switched based approaches are seen as complex and costly, there are alternative approaches which facilitate the implementation of the Standards in a timely and cost effective manner. Where reasonable implementation alternatives exist, demonstrating

¹ Interim Standard, Lawfully Authorized Electronic Surveillance, J-STD-025, TIA TR45.2 and Committee T1, November 20, 1997.

² Comments of Nextel Communications, Inc., May 20, 1998, pgs 8 & 9.

³ Comments of "Ameritech", May 20, 1998, pg. 7

⁴ Comments of AT&T Corp., May 20, 1998, Page 12.

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that one of those alternatives is "neither cost-effective or efficient" does not negate the soundness of the Standard. Indeed, this view is fundamentally supported by BellSouth as, in their opinion: "...J-STD-025 does not differentiate between network-based solutions and switched-based solutions, ... If a network-based solution can provide the information to be passed over the interface, the standard can support it." IST submits that network-based solutions, whether it be IST's design or that of others, meets the test of both cost effectiveness and technical achievability.

Respectfully submitted:



Gerald W. Fikis
Group Leader - Technology &
Business Line Management
Bell Emergis - Intelligent Signalling Technologies
(613) 781 7293

12 June, 1998

Bell Emergis - ISTechnologies

CC Docket No. 97-213

CERTIFICATE OF SERVICE

I, Valerie J Hennessay, hereby certify that I have on this 12th day of June, 1998, caused to be served by first call mail, postage prepaid, or by hand delivery, a copy of the foregoing "Bell Emergis - Intelligent Signalling Technologies' Reply Comments Regarding the Technical Requirements and Standards for CALEA" to the following:

SERVICE LIST

Daniel Phythyon, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M. Street, N.W., Room 5002
Washington, DC 20554

A. Richard Metzger, Chief
Common Carrier Bureau
Federal Communications Commission
1919 M. Street, N.W., Room 500B
Washington, DC 20554

Kent Nilsson
Deputy Division Chief
Network Services Division
Common Carrier Bureau
2000 M. Street, N.W., Room 235
Washington, DC 20554

Lawrence Petak
Office of Engineering and Technology
Federal Communications Commission
2000 M. Street, N.W., Room 230
Washington, DC 20554

David Wye
Telecommunications Policy Analyst
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M. Street, N.W., Room 5002
Washington, DC 20554

Geraldine Matise
Chief, Network Services Division
Common Carrier Bureau
2000 M. Street, N.W., Room 235
Washington, DC 20554

David Ward
Network Services Division
Common Carrier Bureau
2000 M. Street, N.W., Room 210N
Washington, DC 20554

Charles Isman
Office of Engineering and Technology
Federal Communications Commission
2000 M. Street, N.W., Room 230
Washington, DC 20554

Jim Burtle
Office of Engineering and Technology
Federal Communications Commission
2000 M. Street, N.W., Room 230
Washington, DC 20554

James X. Dempsey, Sr. Staff Counsel
Daniel J. Weitzner, Deputy Director
Center For Democracy & Technology
1634 Eye Street, N.W., Ste. 1100
Washington, Dc 20006

Mary McDermott
Linda Kent
Keith Townsend
Lawrence E. Sarjeant
United States Telephone Ass'n.
1401 H Street N.W., Ste. 600
Washington, DC 20005

Grant Seiffert, Dir. Of Gov't. Relations
Matthew J. Flanigan, President
Telecommunications Industry Ass'n.
1201 Pennsylvania Avenue, N.S., Ste. 315
Washington, DC 20004

Michael P. Goggin
BellSouth Cellular Corp.
1100 Peachtree Street, N.E., Ste. 910
Atlanta, GA 30309-4599

J. Lloyd Nault, II
BellSouth Telecommunications, Inc.
4300 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375

Martin L. Stern
Lisa A. Leventhal
Preston Gates Ellis & Rouvelas
Meeds LLP
1735 New York Avenue, N.W., Ste. 500
Washington, Dc 20006

Kurt A. Wimmer, Esq.
Gerard J. Waldron, Esq.
Alane C. Weixel, Esq.
Covington & Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, DC 20044-7566

Michael W. White
BellSouth Wireless Data, L.P.
10 Woodbridge Ctr. Dr., 4th Floor
Woodbridge, NJ 07095-1106

Mr. Robert Sutherland
Theodore R. Kingsley
BellSouth Corporation
1155 Peachtree Street, N.E., Ste. 1700
Atlanta, GA 30309-3610

Charles M. Nalbhone
BellSouth Personal Communications, Inc.
3353 Peachtree Road, N.E.
Atlanta, GA 30326

Pamela J. Riley
David A. Gross
AirTouch Communications, Inc.
1818 N Street, N.W.
Ste. 320 South
Washington, DC 20036

Lisa M. Zaina, V.P. and Gen. Counsel
Stuart Polikoff, Sr. Regulatory and
Legislative Analyst
OPASTCO
21 Dupont Circle NW, Ste. 700
Washington DC 20036

Elaine Carpenter
Aliant Communications
1440 M Street
Lincoln, NE 68508

Emilio W. Cividanes
Piper & Marbury, L.L.P.
1200 19th Street, N.W.
Washington, DC 20036

Peter M. Connolly
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Washington, DC 20036

Susan W. Smith, Director-External Affairs
CenturyTel Wireless, Inc.
3505 Summerhill Road
No. 4 Summer Place
Texarkana, TX 75501

Michael W. Mowery
AirTouch Communications, Inc.
2999 Oak Road, MS1025
Walnut Creek, CA 95596

James F. Ireland
Theresa A. Zeterberg
Cole, Raywid & Braverman, L.L.P.
1919 Pennsylvania Avenue, N.W., Ste. 200
Washington, DC 20006

Robert S. Foosaner, V.P. & Chief
Regulatory Officer
Lawrence R. Krevor, Director -
Government Affairs
Laura L. Holloway, General Attorney
Nextel Communications, Inc.
1450 G Street, N.W., Ste. 425
Washington, DC 20005

Glenn S. Rabin, Federal Regulatory Counsel
ALLTELL Communications, Inc.
ALLTELL Corporate Services, Inc.
655 15th Street, N.W., Ste. 220
Washington, DC 20005

L. Marie Guillory
Jill Canfield
Nat'l. Telephone Cooperative Ass'n.
2626 Pennsylvania Avenue, N.W.
Washington, DC 20037

Judith St. Ledger-Roty
Paul G. Madison
Kelley Drye & Warren, LLP
1200 19th Street, N.W., Ste. 500
Washington, DC 20036

Catherine Wang
Swidler & Berlin Chtd.
3000 K Street, N.W., Ste. 300
Washington, DC 20007

Gerald W. Fikis, Group Leader
Technology & Business Line Mgmt.
Bell Emergis - Intelligent Signaling Tech.
78 O'Connor Street, Ste. 412
Ottawa, Ontario
Canada K1P 3A4

Douglas I. Brandon
AT&T Wireless Services
1150 Connecticut Avenue, 4th Floor
Washington, DC 20036

Jill F. Dorsey, V.P./Gen. Counsel
POWERTEL, Inc.
1233 O.G. Skinner Drive
West Point, GA 31833

Joseph R. Assenzo, Esq.
Sprint Spectrum L.P. d/b/a Sprint PCS
4900 Main Street, 12th Floor
Kansas City, MO 64112

John T. Scott, III
Crowell & Moring LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004

Mark C. Rosenblum
Ava B. Kleinman
Seth S. Gross
AT&T Corporation
295 N. Maple Ave., Rm 3252F3
Basking Ridge, NJ 07920

Michael Altschul, V.P. & Gen. Counsel
Randall S. Coleman, V.P., Regulatory
Policy & Law
Cellular Telecommunications Industry
Association
1250 Connecticut Ave., N.W., Ste. 200
Washington, DC 20036

Richard J. Metzger
Emily M. Williams
Ass'n. for Local Telecommunications Services
888 17th Street, N.W., Ste. 900
Washington, DC 20006

John F. Raposa
Richard McKenna
GTE Service Corporation
600 Hidden Ridge, HQE03J36
P.O Box 152092
Irving, TX 75015-2092

David L. Nace
B. Lynn F. Ratnavale
Lukas, Nace, Gutierrez &
Sachs Chartered
1111 19th Street, N.W., Ste. 1200
Washington, DC 20036

Kevin C. Gallagher, Senior V.P. -
General Counsel & Secretary
360° Communications Company
8725 W. Higgins Road
Chicago, IL 60631

Mark. J. Golden, Sr. V.P., Industry Affairs
Robert Hoggarth, Sr. V.P., Paging/Narrowband
Personal Communications Industry Ass'n.
500 Montgomery Street, Ste. 700
Alexandria, VA 22314-1561

Honorable Janet Reno
Stephen W. Preston
Douglas N. Letter
Scott R. McIntosh
Daniel Kaplan
U.S. Department of Justice
601 D Street, N.W., Rm. 9106
Washington, DC 20530

Andre J. Lachance
GTE Service Corporation
1850 M Street, N.W., Ste. 1200
Washington, DC 20036

Stephen L. Goodman
William F. Maher, Jr.
Halprin, Temple, Goodman & Sugrue
1100 New York Avenue, NW.
Ste. 650, East Tower
Washington, DC 20005

Eric W. DeSilva
Stephen J. Rosen
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

Louis J. Freeh, Director
Larry R. Parkinson, Gen. Counsel
Federal Bureau of Investigation
935 Pennsylvania Avenue, N.W.
Washington, DC 20535